

Colorado Department of Health  
Hazardous Materials & Waste Management Division

Comments

on

DRAFT

HISTORICAL RELEASE REPORT

FOR THE

ROCKY FLATS PLANT

JANUARY 1992

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GENERAL COMMENTS:

1) The following IHSSs have been changed from their original OU to a new OU based on the nature of the IHSS and the type of investigation being proposed for the OU:

IHSS 122:	From OU 13 to OU 9
IHSS 123.2:	From OU 8 to OU 9
IHSS 124.1-3:	From OU 10 to OU 9
IHSS 125:	From OU 8 (not OU 10) to OU 9
IHSS 126.1&2:	From OU 8 to OU 9
IHSS 127:	From OU 8 to OU 9
IHSS 132:	From OU 8 to OU 9
IHSS 146.1-6:	From OU 8 to OU 9
IHSS 147.1:	From OU 12 to OU 9
IHSS 149:	From OU 8 to OU 9
IHSS 156.2:	From OU 14 to OU 6
IHSS 159:	From OU 8 to OU 9

In addition, the following IHSSs have been misidentified in the HRR and should be corrected as follows:

IHSS 212:	OU 15 not OU 10
IHSS 215:	OU 15 only, not OU 9 and OU 15
IHSS 216.2&3	OU 2 not OU 6 (216.1 is in OU 6)

Please modify PAC discussions, including RFI/RI Report delivery dates, and Table 3-2 accordingly.

2) The Division suggests that the Operable Unit designation, as applicable, be included at the beginning of each PAC discussion in addition to its inclusion under Fate of Constituents Released to the Environment.

3) The following PACs/UBCs are not shown on the respective figures:

PAC NW-195	Figure NW-1
PAC 000-162	Figure 000-1
PAC 000-190	Figure 000-1
PAC 000-192	Figure 000-1
PAC 100-611	Figure 100-1
PAC 500-169	Figure 500-1
PAC 700-1110	Figure 700-1
(PAC 1111 should be changed to 1110?)	
PAC 800-1209	Figure 800-1
PAC 900-1300	Figure 900-1
UBC Bldg 444	Figure UBC-1

Please update the figures.

4) Many PACs are shown on their respective figures as having been changed (green color). However, the text portion for these PACs does not indicate why these IHSSs need to be changed. Please review the text for the "changed" PACs and include text that explains the needed changes.

5) A table listing the HRR area in which each IHSS has been included would be a very useful tool to cross-reference with Table 2 in the Statement of Work (SOW) of the IAG.

#### Specific Comments:

Section 2.3.2: In the fourth paragraph, page 2-6, it is stated that the HRR project database and files will be turned over to EG&G. Will this occur upon completion of the final HRR or at a later time? It would appear that the quarterly updates would necessitate a delay in this transfer. The Division assumes that EG&G will maintain these records and asks that EG&G make copies of documents available to the regulatory agencies upon request. It may become necessary for the agencies to review actual reports in order to evaluate IHSS boundary changes or determine the need for additional IHSSs.

Section 2.3.4: Criteria for tracking indoor unplanned events are listed on page 2-10. The Division questions why events not included on the "Summary of Events" are tracked while, apparently, those on the list are not tracked. Is this criterium

misstated? Although the "great number" of events adds difficulty to the task, the Division is concerned that a number of these listed events "had the potential to contribute to contamination of the environment beneath and around the building(s)"(see page 2-9). If occurrences on the "Summary of Events" have been excluded, the Division regards this as a serious omission and not in compliance with the language of the IAG pertaining to this report. Please respond!

**Section 3.0:** The following comments pertain to PAC Reference Number and Name, IHSS Reference Number and Unit Number on page 3-3. This paragraph would be clearer if subdivided into five paragraphs, i. e. buffer zone discussion, RFP manufacturing facility designations, 000 designations, offsite areas, and UBC sites.

The text and reference to Figure 3-1 is misleading. Figure 3-1 shows twelve, not fourteen, locations. Designations 000 and Offsite are not shown. The text should explain that these designation round out the fourteen geographic areas.

Please note that except for its inclusion in Table 3-1, the "000" designation, and its purpose, is not discussed.

Please clarify, for the benefit of readers, that the buffer zone quadrant designations only apply to PACs that are outside the numbered manufacturing facilities. Discussion of the Central and Eighth Avenue dividing lines may inadvertently lead the reader to conclude that the numbered areas carry buffer zone designations and manufacturing facility designations.

It should be further clarified in the text that PACs within a specific Operable Unit may carry a buffer zone alpha designation, a manufacturing facility numeric designation, or the 000 designation (i.e. OUs boundaries do not coincide with this designation scheme).

**Table 3-1:** The assignment of IHSS 168, West Spray Field, to the SW quadrant (SW-168) is inconsistent with the purpose of the 000 designation. A portion of the West Spray Field is also located in the NW quadrant; therefore, this unit should be 000-168. The Solar Evaporation Ponds (000-101) are consistent with the intended approach.

**References:** Under this heading, page 3-21, a Section 5.0 is discussed. Section 5.0 is not listed in the Table of Contents nor is it located in either Volumes I or II.

**PAC REFERENCE NUMBER: NE-156.2:** Under Comments, the southwesterly extension of the Soil Dump Area, Figure NE-1, is not well supported. Is the extension based on air photos or ground truthing.

**PAC REFERENCE NUMBER: NE-166.1 - 166.3:** Trench C (166.3) consists of two separate trenches according to the OU-6 Phase I RFI/RI Workplan. Figure NE-1 excludes the trench reportedly situated between Trench A (166.1) and Trench B (166.2). This discrepancy needs to be addressed then reported in the text.

Under Responses to Operation or Occurrence, page NE-35, the West Landfill Pond, was buried beneath landfill waste not removed. This pond will be investigated through the OU-7 RFI/RI Workplan to determine if it is a source of contamination. Please amend the text.

**PAC REFERENCE NUMBER: NW-114:** The last sentence under Comments, page NW-11, is incorrect. The OU-7 Phase I RFI/RI Workplan has been modified. The boundary shown on Figure NW-1 is that of the Operable Unit 7 not NW-114 (IHSS 114). The IAG map shows the correct boundary for IHSS 114. Please correct Figure NW-1 and the narrative.

**PAC REFERENCE NUMBER: SE-1600:** For the purpose of RFI/RI investigations, the Division requests as much information as possible be included on the location of this, and any other, former pond location. Please include a map with the location and extent of Ponds 6, 7, 8, and 9.

**PAC REFERENCE NUMBER: SW-115:** Based on the most recent version of the Phase I RFI/RI Workplan for OU 5, the extent of IHSS 115 extends south of the SID (Surface Interceptor Ditch). This has been verified by Division personnel on several field visits. Please review the historical photo and document information to help us figure out the limits to the Old Landfill. The Division is still concerned that accurate limits have yet to be determined.

**PAC REFERENCE NUMBER: SW 133.1 - SW 133.4:** Did field reconnaissance of the Ash Pit locations verify that the staking of the pits in the field matched the aerial photos as to pit location? Contrary to the text, the locations of the pits shown on Figure SW-1 show significant differences, both for size and location, when compared to equivalent figures in the OU 5 RFI/RI Workplan. The Ash Pit locations have been an ongoing question for OU 5 and any information that can be included in the HRR that could shed additional light on this issue would be greatly appreciated.

**PAC REFERENCE NUMBER: SW-168:** Under Comments, page SW-15, the reference should be to the OU-11 Phase I RFI/RI Workplan dated March 16, 92 or subsequent revisions.

**PAC REFERENCE NUMBER: 100-196:** Figure 100-1 shows this PAC to be located northwest of Building 124 not south of the building as stated in the location description.

Figure 700-1: The Division requests that the clutter of this figure be relieved by dividing it into three figures, i. e. original IHSSs, changed IHSSs, and Potential IHSSs. This request may be applicable to one or more additional figures.

PAC REFERENCE NUMBER: 700-126.1 - 700-126.2: Only PAC 700-126 is shown on Figure 700-1; this is inconsistent with the presentation of other "decimal" units in the figure.

PAC REFERENCE NUMBER: 700-146.1 - 700-146.6: See equivalent comment to PAC 700-126.1 - 700-126.2.

PAC REFERENCE NUMBER: 700-149: Did a release and cleanup occur following the 1973 plastic line break. If so, is the site included within the proposed 20 x 120 foot area at the west end of the pipeline.

PAC REFERENCE NUMBER: 900-165: The OU-6 RFI/RI Workplan includes a discussion of acid spills at the Triangle Area. Please review this work plan and determine if additional information should be included.

PAC REFERENCE NUMBER: 900-1300: Reference is made under Description of Operation or Occurrence to the 904 Pad. The location of the 903 Pad is shown on Figure 900-1 but the 904 Pad is not. Please add.

Section 3.14: As discussed earlier under the general comments section, UBC 444 is not shown on Figure UBC-1. However, the division questions the need to include it in this section since it is an established IHSS and was discussed previously. Several additional buildings may be similarly contaminated but have not been shown as UBCs.

Section 3.15: Many of these PICs, perhaps most, could be reasonably and generally located on a map. Although the "exact" locations may not be known this is generally true for the PACs and many IHSSs. One of the purposes of an RFI/RI investigation is to more precisely locate the IHSSs. The Division requests that the PICs be mapped to the extent possible.